

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 00-6275-CR-HURLEY

UNITED STATES OF AMERICA,

v.

RAMON NORTHCUT,

Defendant.

**GOVERNMENT'S MOTION PURSUANT TO
RULE 35(b)(2)(B), FEDERAL RULES OF CRIMINAL OF PROCEDURE**

The United States of America, by and through the undersigned Assistant United States Attorney for the Southern District of Florida, submits this Motion Pursuant to Rule 35(b)(2)(B), Federal Rules of Criminal Procedure, as follows:

1. On April 20, 2001, the defendant pled guilty to possession with intent to distribute "crack" cocaine (DE 35-36). On August 30, 2001, the defendant was sentenced to 108 months' imprisonment and three years' supervised release.

2. Prior to being sentenced, the defendant expressed the desire to cooperate with law enforcement authorities. Subsequent to his sentencing, the defendant was able to cooperate with Immigration and Customs Enforcement (ICE) in the investigation and prosecution of several narcotics cases. The defendant assisted in the successful investigation of a historical narcotics case by ICE and the U.S. Attorney's Office in Miami, Florida. The defendant assisted ICE in locating three fugitives in that case, all of whom were apprehended, convicted and sentenced to terms of imprisonment. The defendant also assisted ICE in the successful investigation of a narcotics dealer in Fort Lauderdale, Florida.

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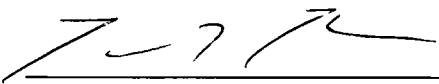
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3. The defendant assisted the Broward Sheriff's Office, Fort Lauderdale Police Department and the Broward State Attorney's Office in the successful prosecution of a homicide case. Information provided by the defendant led directly to the identification and arrest of the perpetrator. In the case of *State of Florida v. Lawrence Permenter*, the defendant was convicted and sentenced to 25 years' imprisonment.

4. The defendant has provided information, on numerous occasions, to law enforcement which proved to be useful to authorities more than one year after the defendant's sentencing. The defendant's assistance has proved to be substantial in nature. Accordingly, the United States respectfully requests that, pursuant to Rule 35(b)(2)(B) of the Federal Rules of Criminal Procedure, that the defendant's sentenced be reduced by one-third.

Respectfully submitted,

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UNITED STATES ATTORNEY

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was delivered via telephone facsimile this 25th day of April 2006, to Assistant Federal Public Defender Robert N. Berube, 1 East Broward, Blvd., Fort Lauderdale, FL 33301.



TERRENCE J. THOMPSON
ASSISTANT UNITED STATES ATTORNEY